

RURAL TELECOMMUNICATIONS GROUP

the voice of rural wireless telecommunications providers

*1000 Vermont Avenue, NW, 10th Floor
Washington, DC 20005*

MEMORANDUM

**To: Magalie Roman Salas, Secretary
Federal Communications Commission**

From: Caressa D. Bennet, Regulatory Counsel

Date: October 8, 1999

Re: Oral *Ex Parte* Presentation - October 8, 1999

**Calling Party Pays Service Offering in the Commercial Mobile Radio Services;
WT Docket No. 97-207**

Today, Caressa D. Bennet, Robin E. Tuttle, Edward D. Kania, and Sina Miakhail, of Bennet & Bennet, PLLC, representing the Rural Telecommunications Group (RTG), participated in a telephone conference call with Joseph Levin and Jay Whaley, of the Federal Communications Commission's (FCC or Commission) Wireless Telecommunications Bureau concerning issues relating to the above proceedings. Also participating on the call were RTG members Leaco Rural Telephone Cooperative, represented by John Smith, General Manager; Colorado Valley Telephone Cooperative, represented by Mark Rutherford, Assistant General Manager; and Valley Telephone Company, represented by Charles Gowder, General Manager.

The representatives of RTG reiterated arguments and positions contained in RTG's comments in the proceeding referenced above on calling party pays (CPP) service offering in the Commercial Mobile Radio Services. Specifically, RTG representatives stated their support for the four CPP notification elements proposed by the Commission, stressing that the notification time should not be chargeable airtime (*i.e.*, the meter shouldn't be running during the notification announcement) and that callers to a CPP subscriber should have the option to bypass a CPP notification announcement. The RTG representatives emphasized that options for billing and collecting for CPP calls should be kept open, allowing CMRS providers to choose and negotiate the best method for them to bill and collect for such calls. The RTG representatives also responded to Commission questions on the costs to small local exchange carriers (LEC) (all RTG companies are CMRS providers with small LEC affiliates) of implementing measures to provide billing and collection for CPP calls to other CMRS providers, noting that such costs are minimal for affiliates of RTG members.

This memorandum is being submitted electronically pursuant to Sections 1.49(f) and 1.1206(b)(2) of the Commission's rules.